

CHARLES A. BONNER, ESQ. SB# 85413  
A. CABRAL BONNER, ESQ. SB# 247528  
**LAW OFFICES OF BONNER & BONNER**  
475 GATE FIVE RD, SUITE 212  
SAUSALITO, CA 94965  
TEL: (415) 331-3070  
FAX: (415) 331-2738  
[cbonner799@aol.com](mailto:cbonner799@aol.com)  
[cabral@bonnerlaw.com](mailto:cabral@bonnerlaw.com)

## ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ALI SALEEM BEY and JOHN MUHAMMAD BEY,  
Plaintiffs,  
vs.  
CITY OF OAKLAND, et al.,  
Defendants

) Case No: 14-cv-01626-JSC  
) [PROPOSED] ORDER GRANTING  
) PLAINTIFF'S MOTION TO FILE  
) DOCUMENTS UNDER SEAL  
) Hearing Date: JULY 29, 2019  
) Time: 10:00 a.m.  
) Courtroom: F  
) Place: 15<sup>th</sup> Floor  
) 450 Golden Gate Ave.  
) San Francisco, CA  
) Judge: The Hon. Jacqueline S. Corley

Plaintiffs **ALI SALEEM BEY** and **JOHN MUHAMMAD BEY** has filed with the Court a Motion to File Documents Under Seal. As set forth in Plaintiff's Motion to File Documents Under Seal, Plaintiff has lodged the following documents from the Declaration of A. Cabral Bonner in opposition to Defendants' Motion for Summary Adjudication with this Court:

- a. Exhibit 2: Deposition of Ersie Joyner
  - b. Exhibit 4: Deposition of Paul Figueroa
  - c. Exhibit 5. Deposition of Patrick Caceres
  - d. Exhibit 6: Excerpts of DOJ Longmire Interview

PROPOSED ORDER GRANTING PLAINTIFF'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL  
14-cv-01626-JSC

- 1 e. Exhibit 7: 04-019500 LRMS Waajid Bey
- 2 f. Exhibit 8: 05-034462 Case Notes
- 3 g. Exhibit 9: 05-034462 John Bey Incident Report
- 4 h. Exhibit 10: 05-034462 Police Reports
- 5 i. Exhibit 11: 07-0538 Log
- 6 j. Exhibit 13: 07-0538 CPRB Complaint
- 7 k. Exhibit 14: 7/12/07 Dellums Letter to DA
- 8 l. Exhibit 15: 07-059842 CPRB Follow-up Report
- 9 m. Exhibit 16: 07-0553 Log
- 10 n. Exhibit 17: 07-0553 DOJ Report
- 11 o. Exhibit 19: 13-1062 10/4/13 Email from Lois to Griffin
- 12 p. Exhibit 20: 13-1062 11/6/13 CRPB Continued Complaint
- 13 q. Exhibit 21: 13-1062 Log
- 14 r. Exhibit 22: 13-1062 Email Notice to Downing Regarding Sustained Allegation
- 15 s. Exhibit 23: 13-1062 4/15/14 Email Cunningham to Supriano
- 16 t. Exhibit 24: 13-1062 ASB Closing Out
- 17 u. Exhibit 25: 13-1062 JMB Closing Out
- 18 v. Exhibit 26: 13-1062 Report
- 19 w. Exhibit 28: 13-1062 Att 1-13 Joyner Transcript
- 20 x. Exhibit 29: Outlaw Email Letter 8/15/13
- 21 y. Exhibit 30: 13-1062 Letters and Emails to OPD
- 22 z. Exhibit 32: 13-1062 CPRB Notice and Complaint
- 23 aa. Exhibit 38: Deposition of William Griffin
- 24 bb. Exhibit 39: CID Call Schedule
- 25 cc. Exhibit 40: 7/25/07 IAD Note
- 26 dd. Exhibit 45: Letter Dated February 21, 2013
- 27 ee. Exhibit 46: Letter Dated November 30, 2012

ff. Exhibit 47: Letter Dated November 5, 2012  
gg. Exhibit 48: Letter Dated February 8, 2013  
hh. Exhibit 49: Complaint Investigation Report  
ii. Exhibit 50: Letter Dated January 7, 2013  
jj. Exhibit 53: Photos of John Bey and Crime Scene  
kk. Exhibit 54: 05-0538 Complaint Investigation Report  
ll. Exhibit 55: 10/4/11 Email from Robyn Clark to Robert Messier  
mm.Exhibit 58: 13-1062 CPRB Case Assignment Form  
nn. Exhibit 59: Bey's Complaints

This motion is made on the basis that the exhibits to the Declaration of A. Cabral Bonner in Support of Plaintiff's Opposition to Defendant's Motion for Summary Adjudication refer to exhibits that have been designated as "CONFIDENTIAL – Subject to Protective Order" by Defendant City of Oakland pursuant to the Protective Order [Docket No. 96] in this action. This request is narrowly tailored to seal only that material for which good cause to seal has been established.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Jacqueline Scott-Corley